

Stern, Lavinthal & Frankenberg, LLC

105 Eisenhower Parkway, Suite 302

Roseland, New Jersey 07068

Telephone Number (973) 797-1100

Telecopier Number (973) 228-2679

Attorneys for Secured Creditor,

Carrington Mortgage Services, LLC

By: Maria Cozzini, Esq.

In Re:

Praveen K Andapally

Debtor(s)

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
Trenton VICINAGE

Chapter 13

Case No. **19-10108-KCF**

Hearing Date: March 13, 2019

NOTICE OF OBJECTION TO CONFIRMATION OF PLAN

Carrington Mortgage Services, LLC ("Secured Creditor"), the holder of a mortgage on the real property of the debtor(s) known as **310 Green Hollow Drive, Woodbridge, NJ 08830**, by and through its undersigned attorneys, hereby objects to the confirmation of the Chapter 13 Plan.

1. Debtor(s) Chapter 13 Plan proposes to pay Secured Creditor \$23,056.84 in pre-petition arrears. However, Secured Creditor's Proof of Claim, which will be filed prior to the deadline for filing claims, will contain arrears of approximately \$28,407.78.
2. Debtor(s) seeks to modify the rights of Secured Creditor, which is the holder of a claim secured only by a security interest in real property that is the principal residence of the debtor(s).
3. Debtor(s) proposed plan fails to comply with the requirements of the Bankruptcy Code and is not proposed in good faith.
4. Debtor(s) proposed plan does not provide that Secured Creditor retain its lien.

5. Debtor(s) proposed plan is not feasible.
6. Debtor(s) proposed plan fails to comply with other applicable provisions of Title 11.

In the event any portion of the claim is deemed to be an unsecured claim as defined by the Code, objection is hereby made pursuant to 11 U.S.C. Section 1325(a)(4) and 1325(b), et seq. unless the plan provides for full payment of the claim.

Stern Lavinthal & Frankenberg LLC
Attorneys for the Secured Creditor,
Carrington Mortgage Services, LLC
/s/ Maria Cozzini, Esq.
Maria Cozzini, Esq..

Dated: February 5, 2019

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

In Re:

Case No.: _____

Chapter: _____

Adv. No.: _____

Hearing Date: _____

Judge: _____

CERTIFICATION OF SERVICE

1. I, _____ :

☐ represent _____ in this matter.

☐ am the secretary/paralegal for _____, who represents
_____ in this matter.

☐ am the _____ in this case and am representing myself.

2. On _____, I sent a copy of the following pleadings and/or documents
to the parties listed in the chart below.

3. I certify under penalty of perjury that the above documents were sent using the mode of service
indicated.

Date: _____

Signature

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)